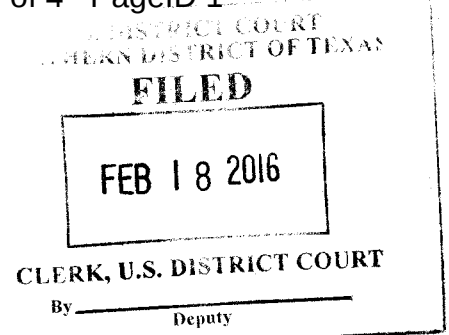


UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

ADNAN SHAHZAD (01)

No. 4:16-mj-125

**CRIMINAL COMPLAINT**

I, Mary Kristin Goldschmitt, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

1. I am a Special Agent (SA) with the Federal Bureau of Investigation and have been since 2010. I am currently assigned to the Dallas Division located at One Justice Way, Dallas, Texas 75220. Since joining the FBI, I have been involved in investigations of violent crimes, white collar crimes, organized crime, and computer crimes. I am currently assigned to investigate Sexual Exploitation of Children (SEOC) violations of federal law. I have gained expertise in the conduct of such investigations through training in seminars, classes, and everyday work related to conducting these types of investigations. I also have participated in training in the investigation of online solicitation and federal enticement cases, in which computers and other electronic media are used as the means for persuading, inducing, and/or enticing minors to engage in unlawful sexual activity, in violation of 18 U.S.C. § 2422(b).

2. The information contained in this Complaint sets forth facts and suggests reasonable inferences from those facts, establishing that there is probable cause to believe that from on or about October 22, 2015, until on or about December 20, 2015, in the Northern District of Texas, Adnan Shahzad, using a facility or means of interstate or foreign commerce, knowingly attempted to persuade, induce, and entice a person who had not attained the age of eighteen (18) years of age, to engage in any sexual activity for which any person can be charged with a criminal offense, in violation of 18 U.S.C. § 2422(b).

3. I am familiar with the information contained in this Complaint based upon the investigation I have conducted and based upon my conversations with other law enforcement officers who have participated in this investigation and engaged in numerous investigations involving online child enticement. This Complaint accurately summarizes the evidence law enforcement discovered during our investigation; it does not, however, contain every detail known to me about the investigation.

### THE INVESTIGATION

4. On October 22, 2015, Detective Domingo Martinez of the Fort Worth Police Department, while acting in an undercover capacity (UC) posing as a 13-year-old girl, posted an ad on Craigslist stating, *"Hey everyone. Young one here. Im bored and looking to hang out and chill with a cool dude. Im short, athletic, VERY young and looking to hang within the hour or two. hit me up if you down."*

5. The same day, the UC received a response on Craigslist in the undercover email account, which was connected to the Internet. The name registered to the incoming email account was "Adnan Shahzad." The UC told Shahzad that "she" was almost 14 years old. They continued to correspond through email for several days. On October 28, 2015, the UC provided Shahzad a telephone number so that they could text each other. On October 29, 2015, Shahzad started a text message conversation with the UC consisting mostly of small talk.

6. On December 13, 2015, Shahzad texted the UC again. During that conversation, Shahzad requested a "sexy pic" in a swim suit and asked if the UC had ever had phone sex. He also asked if the UC had ever had sex. In response, the UC asked Shahzad if he had ever had sex with any other girls the UC's age. Shahzad responded that "my dick would be too much for you . . . so only oral and fooling around until u r ready."

7. Shahzad asked the UC if the UC had ever done any fooling around. The UC answered in the affirmative. Shahzad asked if it was with someone the UC's age to which the UC responded, "I had been with someone my age and someone older." Shahzad asked if the UC "liked older." The UC told Shahzad he did because they weren't dumb like 13-year-old boys. Shahzad responded, "we know how to satisfy and how to enjoy plus stamina to not cum."

8. The UC asked Shahzad what they would do if they met. Shahzad answered that they would be "hugging, kissing, rubbing, and sucking." The UC asked Shahzad what the UC would be sucking and where Shahzad wanted to be sucked. Shahzad told the UC that he wanted the UC to suck his "dick." The UC then asked Shahzad what he wanted to suck on. Shahzad said that he wanted to suck on the UC's "breasts and pussy." As the conversation continued, Shahzad asked if the UC had any siblings. The UC said an eight-year-old brother and restated that the UC was 13.

9. During the conversation, the UC sent two pictures of an undercover source to Shahzad via text message. The girl in the image was approximately 13 years old at the time the picture was taken. The picture was donated for use in these types of investigations, and was the girl's only involvement in this case. Shahzad responded by sending a picture of a penis. The skin color of the person and penis in the picture was

olive skin. The UC asked for a picture with Shahzad's face in it. He sent a picture of a man who appeared to be of Arab descent. Shahzad and the UC then set Sunday, December 20, 2015, for the day to engage in the sexual activity they had discussed.

10. On December 15, 2015, another text message conversation took place between the UC and Shahzad. The UC asked Shahzad what he wanted to do on Sunday after he picked the UC up. Shahzad stated that he wanted to "make love." He also told said he wanted to "suck [the UC's] breasts."

11. Using the information provided by Shahzad, law enforcement officers researched his identity. The Texas driver's license database was searched and returned a twenty-nine-year-old Asian male named Adnan Shahzad. The UC checked the driver's license photograph against the photograph he texted to the UC, and concluded they depicted the same person. A police database was searched using Shahzad's identifiers. It revealed that the phone number associated with Shahzad matched the one used to send the UC text messages. It also showed that Shahzad was the registered owner of a silver Volkswagen Jetta.

12. During the various conversations with Shahzad, he engaged in sexually explicit conversations over the Internet and by text message with a person he believed to be a 13-year-old girl. Throughout the week of December 13, 2015, Shahzad continued to talk about meeting the UC to engage in sexual activity.

13. On or about December 20, 2015, members of CACU, Human Trafficking and Officers of Zero Tolerance Team 4 of the Fort Worth Police Department and I obtained two rooms at a motel located in Fort Worth, Texas.

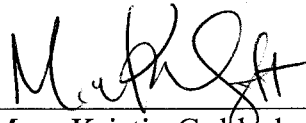
14. Posing as the 13-year-old girl, another Fort Worth police officer spoke with Shahzad several times on the phone. During the final phone conversation, Shahzad asked for the motel room number so he could have his call transferred to the room. As we moved to the room that he was going to call, the UC saw a silver Volkswagen Jetta driving by. The UC recognized Shahzad as the driver from the photographs. Zero Tolerance team Officers were notified and conducted a traffic stop of Shahzad nearby. Officers then brought him to the motel room where the UC interviewed him.

15. After waiving his Miranda rights, Shahzad stated he was looking on Craigslist in the personal ad section. He said he responded to an ad from a person he believed was a 15-year-old girl. He admitted that he talked with her about sexual activity and agreed to meet her for that purpose. He said he may have sent a picture of his penis to her, but was unsure if it was before or after he knew that she was 15 years old. When asked if he would have had sex with the girl if she had been there, he claimed that he probably would have looked at her and left.

16. During the interview, Shahzad was asked if he would like to write an apology letter. Shahzad was told he did not have to do so. Shahzad said that he wanted to write one. In the letter, he wrote that he was sorry and would stay away from "any such activity in the future." He added that he wished he "could have stayed away from every such thing." The sexual acts Shahzad described to the officers would be a violation of Texas Penal Code § 21.11.

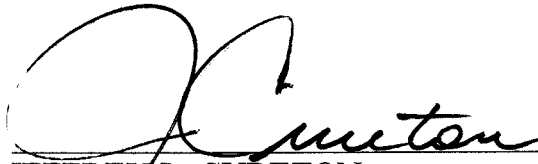
**CONCLUSION**

17. Based on the foregoing facts and circumstances, I respectfully submit that there is probable cause to believe that from on or about October 22, 2015, until on or about December 20, 2015, in the Northern District of Texas, Adnan Shahzad, using a facility or means of interstate or foreign commerce, knowingly attempted to persuade, induce, and entice a person who had not attained the age of eighteen (18) years, to engage in any sexual activity for which any person can be charged with a criminal offense, in violation of 18 U.S.C. § 2422(b).



Mary Kristin Goldschmitt, Special Agent  
Federal Bureau of Investigation

SWORN AND SUBSCRIBED before me, at 3:35 am/pm, this 18<sup>th</sup> day of February, 2016.



JEFFREY L. CURETON  
UNITED STATES MAGISTRATE JUDGE